



## Northeast Waste Management Officials' society

June 3, 2015

**Terri L. Goldberg**  
Executive Director

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Kent Foerster  
US Environmental Protection Agency  
Mail Code: 5306P  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Mr. Foerster:

The Northeast Waste Management Officials' Association (NEWMOA) has a long history of collecting, analyzing, and publishing state data on municipal solid waste (MSW) and construction and demolition (C&D) materials. Our documents are available at [www.newmoa.org/solidwaste/pubs.cfm](http://www.newmoa.org/solidwaste/pubs.cfm). As part of these initiatives, NEWMOA coordinated the development of an agreement among member states about key data elements (and definitions) that states agreed to use for their data collection from C&D materials processing facilities. The resulting November 2012 "Proposed Report Form for Common Data Collection" is attached. NEWMOA appreciates the opportunity to review the C&D materials recycling, reuse, and beneficial use portions of the draft proposed *2014 State Data Measurement Sharing Program*. Based on the experience outlined above, we offer the following comments and suggestions:

- The definitions of "beneficial use" and "recycling" appear to overlap, since both include material that has been diverted from the waste stream into a manufacturing process (for beneficial use) and in the production of new products (for recycling). These terms need to be distinguished with more specific definitions.
- Northeast states typically obtain their data from C&D materials processing facilities and from landfills that dispose of C&D materials. Therefore, it might be difficult for states to report separate numbers for "recycling", "reuse" and "beneficial use" for a given material. Some of the facilities that report to states do not distinguish between material that is recycled and material that is reused. States that receive composite data like this need to be able to report in an aggregated category for given materials. Also, some states are working to capture data from entities that reuse certain kinds of C&D materials (e.g., doors, windows, kitchen and bathroom cabinets, plumbing fixtures, etc). Where this data is available, it would be helpful for states to be able to report it, but the drop-down menu for "reuse" needs to be focused on the types of materials that actually can be reused.

- In the data definitions, the definition of “Beneficial Use” specifically states: “The use of a material as an Alternative Daily Cover in a solid waste landfill is not considered a beneficial use”. Therefore, “Alternative Daily Cover” (ADC) should be removed as a choice for C&D materials under the “beneficial use” section. While some Northeast states consider landfill-based uses of C&D material (e.g., for ADC) to be “disposal”, others consider it to be a “reuse” (please note that there are debates about whether this is a “beneficial” reuse or not). To accommodate the different views on how this material should be characterized, it should be tracked separately both from recycling/reuse/beneficial use and from disposal.
- NEWMOA states are most concerned with understanding the disposition of C&D materials generated from the construction, demolition, and rehabilitation of buildings. Road and bridge projects generate a significant amount of asphalt, brick, and concrete (ABC) that is typically reused within the transportation sector. In addition, ABC is very heavy and so data obtained from road and bridge projects can dwarf data obtained from building projects. Therefore, “Road and Bridge Projects” should be included as an option in the “Sector” drop-down list so C&D materials generated from building projects can be tracked separately from those generated from road and bridge projects.
- NEWMOA states generally do not obtain data specific to “asphalt concrete” “brick and clay tile” and “concrete, cement & Portland cement” but rather obtain this data on these three materials together under the more general category termed “aggregate”. It might be difficult for states to separate out their data into the three requested categories, and we suggest that an “Aggregate” term be added that is defined as the ABC combined.
- NEWMOA states generally track “adulterated” and “unadulterated” wood from C&D materials separately and suggest the database provide this option (“adulterated C&D wood”, “unadulterated C&D wood” and “C&D wood, adulterated & unadulterated combined”).
- NEWMOA suggests that “Asphalt (road & roofing combined)” be removed as a choice, or at a minimum reworded to use the same terms as when they are listed separately (“Asphalt (concrete & roofing combined)”) so asphalt from road projects is not implied.

NEWMOA is a non-profit, non-partisan interstate association whose membership is composed of the state environmental agency directors of the hazardous waste, solid waste, waste site cleanup, emergency response, pollution prevention, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA's mission is to develop, lead, and sustain an effective partnership of states that helps achieve a clean, healthy, and sustainable environment by exploring, developing, promoting, and implementing environmentally sound solutions for:

- Reducing materials use and preventing pollution and waste;
- Properly reusing and recycling discarded materials that have value;
- Safely managing solid and hazardous wastes; and
- Remediating contaminated sites.

For more information on NEWMOA, visit [www.newmoa.org](http://www.newmoa.org).

Thank you for considering our suggestions. Please contact Jennifer Griffith, Project Manager at NEWMOA with any follow-up questions (email: [jgriffith@newmoa.org](mailto:jgriffith@newmoa.org), telephone: 617-367-8558 x303). We look forward to working with you on this important effort.

Sincerely,

A handwritten signature in black ink that reads "Sarah Weinstein". The signature is written in a cursive, flowing style.

Sarah Weinstein, Chair  
NEWMOA Solid Waste Steering Committee

**Construction & Demolition Materials Management  
 NEWMOA Processing Facility Reporting Project  
 Proposed Report Form for Common Data Collection  
 November 5, 2012**

Note: This report form contains the proposed main categories for C&D materials tracking - each state can have several different sub-categories that can roll-up into each of the main categories. States can also collect other information in addition to what is listed in this form. The data grouped in the main categories would be what is shared with stakeholders. These are also the proposed terms and definitions that would be used in state reports and in the stakeholder communications. States would modify their report forms as necessary to be able to provide the information in this proposed form.

**Report Year:** \_\_\_\_\_

**Table 1: Incoming Material**

<b>Material Type</b>	<b>Tons Received</b>	<b>Origin State</b>
<b>Mixed C&amp;D Debris</b>		
<b>Arriving Separated:</b>		
<b>Metal</b>		
<b>Unadulterated C&amp;D wood</b>		
<b>Landclearing Debris</b>		
<b>C&amp;D wood</b>		
<b>Treated wood</b>		
<b>Asphalt roofing material</b>		
<b>Wallboard</b>		
<b>Aggregates</b>		
<b>Corrugated Cardboard</b>		

**Total Tons of Incoming Material:** \_\_\_\_\_

**Table 2: Outgoing Materials** – use a separate row for each facility that a material type was sent to (use extra sheets as needed)

Material Type	Tons Removed	Destination Facility Name	Destination Facility City/Town	Destination Facility State
C&D Debris Sent for Disposal				
C&D Debris Sent for Further Processing				
C&D Fines and Residuals for Landfill Uses				
C&D Fines and Residuals for Other Uses – Specify Uses:				
<b>Recovered Materials:</b>				
Metal				
Unadulterated Wood				
C&D Wood for Fuel Use				
C&D Wood for Other Uses – Specify Uses:				
Asphalt Shingles				
Gypsum Wallboard – Unadulterated				
Aggregates				
Corrugated Cardboard				
Other Carpet Mattresses Large Rigid Plastics Furniture Other – specify:				

**Total Tons of Material Removed:** \_\_\_\_\_

**Explain if Total Tons Incoming ≠ Total Tons Removed:** \_\_\_\_\_  
 \_\_\_\_\_

## **Definitions:**

**C&D project:** construction, remodeling, repair or demolition of a building or other structure and related work. Does not include projects that only involve construction, remodeling, repair or demolition of pavement, roads, or bridges.

**Mixed C&D Debris:** materials and rubble resulting from C&D projects delivered to the facility with the debris mixed together and unsorted.

**Metal:** ferrous and non-ferrous metals, including scrap metal and bulk metal generated from C&D projects.

**Unadulterated C&D Wood:** non-coated (no paint or stain), non-treated wood or wood chips derived from dimensional wood scrap from new construction, shipping pallets, and other unadulterated wood from C&D projects.

**Landclearing Debris:** trees, stumps, brush and other vegetative material resulting from clearing land.

**C&D Wood:** wood or wood chips derived from C&D projects. Can include unadulterated wood and adulterated wood that is not chemically-treated.

**Treated Wood:** chemically-treated wood, including but not limited to: creosote-treated wood, CCA pressure-treated wood, penta-treated wood, and utility poles.

**Asphalt Roofing Material:** material generated from asphalt roof or siding shingle projects including tar paper. Does not include flashing, or slate, tile or wood shingles.

**Wallboard:** paper coated gypsum wallboard/drywall.

**Aggregates:** asphalt, brick, concrete, masonry and ceramic material generated from C&D projects. Does not include soil or rock.

**C&D Debris for Disposal:** Mixed C&D and C&D processing residuals and fines sent to a transfer station or directly for disposal.

**C&D Debris for Further Processing:** Mixed C&D or C&D material that remains after some recyclable materials have been removed that is sent to a facility where it will undergo further processing.

**C&D Fines and/or Residuals for Landfill Uses:** C&D material produced through size reduction and screening, and/or C&D material that remains after recyclable materials have been removed that is sent to a landfill but is not classified as disposal by the landfill.

**C&D Fines and/or Residuals for non-Landfill Uses** – C&D material produced through size reduction and screening, and/or C&D material that remains after recyclable materials have been removed that will be used at a location other than a landfill.

**Asphalt Shingles:** asphalt roof or siding shingles

**Unadulterated Gypsum Wallboard:** scraps of new wallboard containing gypsum generated from installation projects

**Other Materials Generated from a C&D Project:** carpet, furniture, mattresses, rigid plastics, and other separated materials

**Recommended Conversion Factor Guidelines** – cubic yards to/from tons

Mixed C&D Debris – 0.35 tons/yd<sup>3</sup> loose and 0.75 tons/yd<sup>3</sup> compacted

C&D Wood Waste and Chips – 0.33 tons/yd<sup>3</sup>

Aggregates – 0.75 tons/yd<sup>3</sup> large pieces and 1.5 tons/yd<sup>3</sup> processed

Drywall – 0.225 tons/yd<sup>3</sup>

Asphalt Roofing Material – 0.365 tons/yd<sup>3</sup>